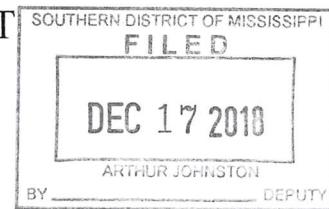


UNITED STATES DISTRICT COURT

for the
Southern District of Mississippi,
Eastern Division



Rodne' Davis-Moss

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Bill Bryant

D.G. Foods (Bill Bryant)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

) Case No. 2:18cv217-KS-MTP
(to be filled in by the Clerk's Office)

) Jury Trial: (check one) Yes No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Rodne' Davis-Moss (Monarch 3.8.7)
E.LL. 7.9.9.5
504 Melba Ave
Hattiesburg
MS 39401
845-777-5010
striving573@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name D.G. Foods
 Job or Title (*if known*) Business
 Street Address 1095 Industrial Drive
 City and County Hazelnut /
 State and Zip Code MS / 39083
 Telephone Number 601-892-0333
 E-mail Address (*if known*) —

Defendant No. 2

Name Bill Bryant
 Job or Title (*if known*) Owner
 Street Address 1095 Industrial Drive
 City and County Hazelnut /
 State and Zip Code MS / 39083
 Telephone Number 601-892-0333
 E-mail Address (*if known*) —

Defendant No. 3

Name Brent Cooper
 Job or Title (*if known*) Director of Human Resources
 Street Address 1095 Industrial Drive
 City and County Hazelnut /
 State and Zip Code MS / 39083
 Telephone Number 601-892-0333
 E-mail Address (*if known*) —

Defendant No. 4

Name OMIT Sophia Applewhite
 Job or Title (*if known*) Sophia Applewhite
 Street Address 76 Moses Ln
 City and County Prentiss /
 State and Zip Code MS 39474
 Telephone Number —
 E-mail Address (*if known*) —

(5) FRANK
 Sanitation Supervisor
 —
 1095 Industrial Drive
 Hazelnut /
 MS / 39083
 —

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *U.S. Code 28 + title 28 Part VI / Title VII of Civil Rights Act of 1990.*

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) *Rodney Davis-Moore*, is a citizen of the State of (name) *Mississippi*.

b. If the plaintiff is a corporation

The plaintiff, (name) *n/a*, is incorporated under the laws of the State of (name) *n/a*, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) *Bill Bryant*, is a citizen of the State of (name) *Mississippi*. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) D.G. Foods, is incorporated under the laws of the State of (name) Mississippi, and has its principal place of business in the State of (name) Mississippi. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) Hazlehurst, Mississippi.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain): 3 million.

I was hired As a Safety Manager & Manager Upon starting work I was given A Quad DPD By Regina Cooper to Accept Supt position, and 3 days later told I was a manager I was told to not speak to employees Give no directions, Just come in and walk around building for 10 hours a day and answer there questions in relevance to production & safety. I go home.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On June 2018 I was hired by Bill Bryant As a Safety Mgr. & Mgr. Upon hire & start date Regina Cooper Director of H.P. gave me a Quad DPD. Accept Supt position. Bill Bryant advised me that I was the manager. They used me for an Audit with no intentions of keeping me as an employee. I explained my A.D.A. and I was made to work overnight, and walk around Building 10 hours a day, and was told not to speak to any employees, managers. Give no directions. Just walk, I was told not to write anyone up, say nothing just walk 10 hours a day. This violated my Civil Rights & freedom of speech and violated ADA rules when Bill Bryant cursed me out, told me I was "Anut" and told me I was disabled & I should just leave.

See Attached documents.

"Emotional Distress"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

After 20 years in Poultry Industry in Senior Management, I was underpaid 65%, demoralized by saying my title was Manager, but not being allowed to provide corrective action to production, because Bill stated I was a ADA case, just walk for 10 hours a day until he asked me to leave in which they paid me 5,000\$ for sexual harassment claim upon Bill, but not ADA nor Civil Rights violations. I believe 3 million dollars should be paid for punitive damages & causing Quad DPD, and violating the ADA Act by demoting me, and embarrassing me by making me stand & walk for 10 hours a day, and being cursed out by employees, managers, and staff. While Bill cursed, teased and tormented me until he stated "Just leave your ADA case" Regina Cooper stated I was Supt Bill stated I was Safety Mgr & Manager this created controversy.

A violate work place, "Hostile Environment" knowing I already had a mental issue that was noted. They defrauded me by causing me to believe I was hired as a manager when they used me for temp help.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

12/17/2018

Signature of Plaintiff

RDM -

Printed Name of Plaintiff

Rodney Davis-Moss**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
